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**UNITED STATES BANKRUPTCY COURT**

**DISTRICT OF NEVADA**

In re

CASH CLOUD, INC.,  
dba COIN CLOUD,

Debtor.

Case No. BK-23-10423-mkn

Chapter 11

**STIPULATION REGARDING  
SCHEDULING OF DATES IN  
CONNECTION WITH ENIGMA'S  
ADMINISTRATIVE EXPENSE CLAIM  
[DOCKET NO. 873], COMMITTEE'S  
STANDING MOTION [DOCKET NO.  
925], AND DEBTOR'S SURCHARGE  
MOTION [DOCKET NO. 926]**

Enigma Securities Limited (“Enigma”), by and through its counsel Morrison & Foerster LLP and Shea Larsen; Cash Cloud, Inc. dba Coin Cloud (“Debtor”), debtor and debtor in possession in the above-captioned case (the “Chapter 11 Case”), by and through its counsel Fox Rothschild LLP; the Official Committee of Unsecured Creditors (the “Committee”), by and through its counsel Seward & Kissel LLP and McDonald Carano LLP; Genesis Global Holdco, LLC (“Genesis”), by and through its counsel Cleary Gottlieb Steen & Hamilton LLP and Snell & Wilmer L.L.P.; and AVT Nevada, L.P. (“AVT” and, together with Enigma, the Debtor, the Committee, and Genesis, the “Parties”), by and through its counsel Michael Best & Friedrich LLP, stipulate and agree as follows (the “Stipulation”):

### RECITALS

A. WHEREAS, on February 7, 2023, Debtor filed a voluntary petition under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the District of Nevada (the “Court”), commencing the Chapter 11 Case;

B. WHEREAS, on February 17, 2023, the United States Trustee for the District of Nevada appointed the Committee in the Chapter 11 Case [Docket No. 131, as amended, Docket No. 177];

C. WHEREAS, on July 17, 2023, Enigma filed its *Notice of Issuance of Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Bankruptcy Case (or Adversary Proceeding)* [Docket No. 850] (the “Rule 2004 Subpoena”), whereby the Debtor had until August 2, 2023 to produce documents responsive to the categories outlined in Exhibit A to the Rule 2004 Subpoena;

D. WHEREAS, on July 18, 2023, Enigma filed *Enigma Securities Limited’s Application for Allowance and Payment of Administrative Expense Claim Pursuant to 11 U.S.C. §§ 361, 362, 363, 364, 503, 507, and Bankruptcy Rules 3012 and 8002* [Docket No. 873] (the “Enigma Administrative Claim”);

E. WHEREAS, on July 24, 2023, the Committee filed the *Motion of the Official Committee of Unsecured Creditors for an Order Granting Leave, Derivative Standing and Authority to Commence, Prosecute and Settle Claims on Behalf of the Debtor’s Estate* [Docket No. 925] (the

1 “Standing Motion”);

2 F. WHEREAS, on July 24, 2023, the Debtor filed its *Motion for Entry of an Order*  
3 *Authorizing Debtor to Surcharge the Collateral of Genesis Global Holdco, LLC, Enigma Securities*  
4 *Limited, and AVT Nevada, L.P.* [Docket No. 926] (the “Surcharge Motion”);

5 G. WHEREAS, on July 26, 2023, Enigma filed *Enigma Securities Limited’s Notice of*  
6 *Deposition of Debtor Cash Cloud Inc., dba Coin Cloud, Pursuant to FRCP 30(b)(6)* [Docket No.  
7 954];

8 H. WHEREAS, on July 31, 2023, Enigma served the Committee with *Enigma Securities*  
9 *Limited’s First Set of Requests for Production to Official Committee of Unsecured Creditors* (the  
10 “Committee RFPs”);

11 I. WHEREAS, on August 1, 2023, the Debtor filed an objection to the Enigma  
12 Administrative Claim [Docket No. 987];

13 J. WHEREAS, the Parties wish to establish certain dates and deadlines with respect to  
14 the resolution of the Enigma Administrative Claim, the Standing Motion, and the Surcharge Motion;

15 NOW, THEREFORE, the Parties hereby stipulate and agree to the following:

16 IT IS STIPULATED AND AGREED that:

17 1. The following dates shall apply with respect to the Enigma Administrative Claim, the  
18 Standing Motion, and the Surcharge Motion:

Event	Proposed Date
Deadline for Debtor to produce documents in connection with the Rule 2004 Subpoena	August 16, 2023
Deadline to object to Standing Motion	August 22, 2023
Depositions of the Debtor’s representatives	August 22-23, 2023
Status conference relating to Surcharge Motion, Enigma Administrative Claim and Standing Motion	August 29, 2023 at 9:30 a.m. (PT)
Deadline for the Committee to produce documents in response to the Committee RFPs	August 30, 2023
Deadline to object to Surcharge Motion	August 30, 2023

Event	Proposed Date
Deadline to supplement objection to Standing Motion based on discovery received	September 8, 2023
Deadline for replies in support of Surcharge Motion	September 13, 2023
Deadline for replies in support of Standing Motion	September 18, 2023
Deadline for Enigma's reply in support of Enigma Administrative Claim	September 18, 2023
Evidentiary Hearing on Standing Motion, Surcharge Motion, and Enigma Administrative Claim	Week of September 25, 2023 (subject to Court's availability)

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1 Dated this 4<sup>th</sup> day of August 2023.

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